

CA P E S S O K O L

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January 7, 2020

Regional Freedom of Information Officer
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Re: Freedom of Information Act Request

Dear FOIA Administrator:

Pursuant to the Freedom of Information Act, 5 U.S.C. Section 552, I request that all documents relating to the following be provided to me:

1. Any and all documents that constitute or evidence communications between the Environmental Protection Agency ("EPA") and the City of Seattle regarding the DUWAMISH RIVER.
2. Any and all reports, studies, or assessments the EPA prepared, directed, supervised, and/or provided to the City of Seattle, the Lower Duwamish Waterway Group, or WASHINGTON concerning the DUWAMISH RIVER, including, but not limited to, any reference documents, tables, figures, graphs, maps, diagrams, or appendices.
3. Any and all models developed, evaluated, considered, adopted, tested, or rejected by the EPA concerning the DUWAMISH RIVER, including, but not limited, to food web model(s), bioaccumulation model(s), environmental fate model(s), sediment transport model(s), conceptual model(s), or mass-balance model(s).
4. Any and all model inputs for any models identified or produced in response to Request for Production No. 3.
5. Any and all datasets collected by, on behalf of, at the direction of, or under the supervision of the EPA or WASHINGTON in connection with the DUWAMISH RIVER, including, but not limited to, data collected in connection with or in support of the remedial design for the DUWAMISH RIVER.

6. Any and all input data used for computer analysis and the resulting data generated through computer analyses conducted on behalf of, at the direction of, or under the supervision of the EPA or WASHINGTON in connection with the DUWAMISH RIVER.

For purposes of these requests, the following definitions shall be deemed incorporated therein:

1. "DUWAMISH RIVER" shall mean and refer to the Lower Duwamish CERCLA site, the East Waterway, the conveyance system associated with the Lower Duwamish CERCLA site and the East Waterway, and the drainage areas associated with the Lower CERCLA site and the East Waterway.
2. "WASHINGTON" shall mean and refer to the State of Washington and its agents, employees, insurers, attorneys, investigators, consultants, affiliates, or any PERSON acting on its behalf, including, but not limited to the Washington Department of Ecology and the Washington Department of Health.

Please provide a copy of the records in their native electronic format on USB or other electronic media. When providing electronic records, please include metadata if reasonably available. In order to help you to determine my status to assess fees, I am an attorney seeking information for use on behalf of my client's business. Please supply the requested records without informing me of the cost if the fees do not exceed \$1,000.00, which I agree to pay as necessary. Otherwise, I ask that you notify me of any search or duplication costs exceeding \$1,000.00, so that I may decide which records I want copied.

If you are not the appropriate contact for this FOIA request, please let me know so that I may direct this request to the appropriate contact. If you deny any part of this request, please cite each specific reason that you believe justifies your refusal to release the information with respect to each document or category of documents refused. Please also notify me of any appeal procedures available under the law.

If you have questions, please contact me at your convenience. Thank you in advance for providing the requested information.

Sincerely,

A handwritten signature in black ink that reads "Lisa DeBord". The signature is written in a cursive, flowing style.

Lisa N. DeBord